

United States District Court

SOUTHERN

DISTRICT OF
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA

V.

Rogelio David Maldonado
A206 889 036
United StatesPRINCIPAL
YOB: 1973United States District Court
Southern District of Texas
FILED

JAN 13 2015

CRIMINAL COMPLAINT

Case Number:

M-15-0028-M

Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 11, 2015 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Jose Jorge Mendoza-Gonzalez, citizen and national of Mexico, along with two (2) other undocumented aliens, for a total of three (3), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Rio Grande City, Texas to the point of arrest near McAllen, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On January 11, 2014, at approximately 10:00 am, DPS Trooper J. Prado conducted a vehicle stop in McAllen, Texas on a white Chrysler 300 for illegal window tint. The driver of the Chrysler, later identified as Rogelio David MALDONADO, told the Trooper he had just stopped to get gas when the three passengers in his car had asked him for a ride to McAllen. Trooper Prado contacted Border Patrol for assistance, and Agents J. Ramirez and N. French arrived. Agents determined MALDONADO to be a United States Citizen, and the three passengers all admitted to being illegally in the United States.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Approved by: Linda Resuarez, AUSA
1/13/15


Signature of Complainant

Sworn to before me and subscribed in my presence,

January 13, 2014

Date

Derek ConrowSenior Patrol Agent

Printed Name of Complainant

at McAllen, Texas

City and State

Dorina Ramos

, U. S. Magistrate Judge

Name and Title of Judicial Officer


Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-15-0028-M

RE: Rogelio David Maldonado

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CONTINUATION:

At the scene, agents read MALDONADO his rights, and he told them that while he was pumping gas, the three people asked him for a ride to McAllen.

All four subjects were transported to the McAllen Border Patrol for processing.

NOTE: Two smuggled aliens were **unaccompanied** 16 and 17 year old juveniles.

PRINCIPAL'S STATEMENT:

At the station, MALDONADO decided he did not wish to make any further statements, and all questioning ceased.

MALDONADO did give written consent to search his cell phone. Agents found multiple texts from a woman who has previously been documented by Border Patrol as being an alien smuggler working out of Rio Grande City, Texas.

MATERIAL WITNESS'S STATEMENT:

The material witness was read his rights. He stated he was willing to provide a statement without the presence of an attorney.

Jose Jorge Mendoza-Gonzalez told agents he was charged \$2,000 to be smuggled into the United States. After illegally crossing the Rio Grande River, the guide took Mendoza and the group to an abandoned house where they stayed the night. The next morning the foot guide took them a brushy area near a road and told them to wait for a white car to pick them up. Shortly after the foot guide left, a white car pulled up next to them, and the group boarded it. The driver told them to put their seatbelts on. Approximately 15 minutes later, when the police stopped them, the driver exclaimed in Spanish "It's over!". Mendoza identified Rogelio David MALDONADO in a photo lineup as the driver of the car.